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Attorneys for Plaintiff CHANEL, INC

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## THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

| CHANEL, INC.,  | ) CASE NO. 07-cv-4858 (NRB) |
|--|-----------------------------|
| a New York corporation,  | )                           |
| Plaintiff,   | ) STIPULATED CONSENT FINAL  |
| ٧,   | ) JUDGMENT                  |
| LINDA ALLEN a/k/a LINDA ROONEY a/k/a —<br>Courtney allen d/b/a | )<br>)                      |
| EUROPEANBEAUTYFASHIONS.COM d/b/a                               | )                           |
| EUROPEAN BEAUTY FASHIONS d/b/a<br>MYCLASSYFASHION.COM d/b/a    |                             |
| MY CLASSY FASHION d/b/a<br>ULTIMATEDESIGNERSHANDBAGS.COM       | )                           |
| d/b/a ULTIMATE DESIGNER HANDBAGS                               | )                           |
| and DOES 1-10,   | ,<br>)                      |
| Derendants.  | )                           |

WHEREAS, this action having been commenced by the Plaintiff, Chanel, Inc. ("Chanel") against Linda Allen a/k/a Linda Rooney a/k/a Courtney Allen d/b/a European Beauty Fashions

d/b/a EuropeanBeautyFashions.com d/b/a My Classy Fashion d/b/a MyClassyFashion.com d/b/a UltimateDesignerHandbags.com d/b/a Ultimate Designer Handbags ("Allen"), alleging inter alia, trademark counterfeiting, trademark infringement, dilution, and unfair competition, and the Plaintiff and the Defendant having resolved the Plaintiff's claims to each of their satisfaction;

## IT IS STIPULATED, ORDERED, ADJUDGED AND DECREED:

- 1. This Court has jurisdiction of the subject matter of all counts of this action and over the named parties hereto.
- 2. Chanel is the owner of the following trademarks (the "Chanel Marks") in connection with handbags, wallets, watches, necklaces, costume jewelry including earrings, and sunglasses and other goods:

| <u>Mark</u> | Reg. No.  | Date of Registration |
|-------------|-----------|----------------------|
| CHANEL      | 0,626,035 | May 1, 1956          |
| CC MONOGRAM | 1,314,511 | January 15, 1985     |
| CHANEL      | 1,347,677 | July 9, 1985         |
| CHANEL      | 1,733,051 | November 17, 1992    |
| CC MONOGRAM | 1,734,822 | November 24, 1992    |
| CC MONOGRAM | 3,025,934 | December 13, 2005    |
| CC MONOGRAM | 3,022,708 | December 6, 2005     |
| CHANEL      | 1,510,757 | November 1, 1988     |
| CC MONOGRAM | 1,654,252 | August 20, 1991      |
| CC MONOGRAM | 3,025,936 | December 13, 2005    |
| CHANEL      | 0,612,169 | September 13, 1955   |
| CHANEL      | 0,902,190 | November 10, 1970    |

| CHANEL      | 0,955,074 | March 13, 1973    |
|-------------|-----------|-------------------|
| CHANEL      | 1,571,787 | December 19, 1989 |
| CC MONOGRAM | 1.501.898 | Anoust 30, 1988   |

which are registered in International Classes 6, 9, 14, 18, and 28 and are used in connection with the manufacture and distribution of, among other things, handbags, wallets, watches, necklaces, costume jewe'ry including earrings, and sunglasses.

- Judgment is entered in favor of the Plaintiff and against the Defendant on all Counts of the Complaint.
- 4. Any party shall have the right to seek sanctions for contempt, compensatory damages, injunctive relief, attorneys' fees, costs, and other relief deemed proper in the event of a violation or failure to comply with any of the provisions hereof. The prevailing party in any such proceeding shall be entitled to recover its attorney's fees and costs.
- 5. This cause between the Plaintiff and the Defendant is hereby dismissed with prejudice, subject to the terms of the Settlement Agreement between the parties.
- The parties' respective attorney's fees and costs incurred in connection with this
  action shall be borne as per the agreement of the individual parties on their Settlement
  Agreement.
- This Court will retain continuing jurisdiction over this cause to enforce the terms
  of this Stipulated Consent Final Judgment and the Settlement Agreement between the parties.

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This Consent Final Judgment shall to deemed to have been served upon the Defendant at the time of its execution by the Court.

## APPROVED AS TO FORM AND CONSENTED TO BY THE PARTIES:

The undersigned hereby consent to the entry of this Consent Final Judgment in form ameed hereto or in such other form as the Court may approve.

| Plaintiff: Ci | hanel, Inc.   | GIBNEY, ANTHONY & FLAHERTY, LLP  |  |
|---------------|---|--|--|
| Dated:        | , 2008  | Hy;  John Macaluso Gibney, Anthony & Flaherty, LLP 665 Fifth Avenue New York, New York 10022 (212) 688-5151 (212) 688-8315 - fax Counsel for Plaintiff, Chanel, Inc. |  |
| Defendant:    | Linda Allen a/k/a Linda<br>Reoney a/k/a Couriney<br>Allen d/b/a European<br>Beauty Fashions d/b/a<br>EuropeanBeautyFashions.co<br>d/b/a My Classy Fashion d/<br>MyClassyFashion.com d/b/a<br>Ultimatedesignerhandbags.cd/b/a Ultimate Designer Ha | tva<br>&<br>com  |  |
| ff is         | 90 ORDERED.   |  |  |
| Dated;        | . 2008  | UNITED STATES DISTRICT JUDGE   |  |

Stipplated Convine Final Judgment

This Consent Final Judgment shall be deemed to have been served upon the Defendant at the time of its execution by the Court.

## APPROVED AS TO FORM AND CONSENTED TO BY THE PARTIES:

The undersigned hereby consent to the entry of this Consent Final Judgment in form annexed hereto or in such other form as the Court may approve.

By

Plaintiff: Chanel, Inc.

Dated: JULY 7 , 2008

GIBŃRY, ANTHONY & FLAHERTY, LLP

John Macaluso

Gibney, Anthony & Flaherty, LLP

665 Fifth Avenue

New York, New York 10022

(212) 688-5151

(212) 688-8315 - fax

Counsel for Plaintiff, Chanel, Inc.

Defendant: Linda Allen a/k/a Linda

Rooney a/k/a Courtney Allen d/b/a European Beauty Fashions d/b/a

EuropeanBeautyFashions.com d/b/a My Classy Fashion d/b/a MyClassyFashion.com d/b/a Ultimatedesignerhandbags.com d/b/a Ultimate Designer Handbags

IT IS SO ORDERED.

Dated: July 16\_\_, 2008

Linda Allen

UNITED STATES DISTRICT JUDGE